ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-19 AND DPR-25

DPR -19	DPR - 25
1/2.1-4	1/2.1-4
3/4.2-8	3/4.2-8
3/4.2-10	3/4.2-10
B 3/4.2-29	B 3/4.2-29
B 3/4.2-31	B 3/4.2-31

1.1 SAFETY LIMIT (Cont'd.)

C. Power Transient

1. The neutron flux shall not exceed the scram setting established in Specification 2.1.A for longer than 1.5 seconds as indicated by the process computer.

2. When the process computer is out of service, this safety limit shall be assumed to be exceeded if the neutron flux exceeds the scram setting established by Specification 2.1.A and a control rod scram does not occur.

D. Reactor Water Level (Shutdown Condition)

Whenever the reactor is in the shutdown condition with irradiated fuel in the reactor vessel, the water level shall not be less than that corresponding to 12 inches above the top of the active fuel when it is seated in the core.

Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

2.1 LIMITING SAFETY SYSTEM SETTING (Cont'd.)

The adjustment may also be performed by increasing the APRM gain by FDLRC, which accomplishes the same degree of protection as reducing the trip setting by 1/FDLRC.

C. Reactor low water level scram setting shall be greater than or equal to 144" above the top of the active fuel at normal operating conditions.
Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

greater than or equal to

D. Reactor low water level ECCS initiation shall be 84" (plus 4", minus 0") above the top of the active fuel at normal operating conditions.
Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

inches

TABLE 3.2.1

INSTRUMENTATION THAT INITIATES PRIMARY CONTAINMENT ISOLATION FUNCTIONS

MINIMUM # OF OPERABLE INST. CHANNELS PER TRIP SYSTEM (1)	INSTRUMENTS	TRIP LEVEL SETTING	ACTION (3)
2	Reactor Low Water Level	Greater than 144" above top of active fuel (9)	A
2	Reactor Low Low Water	Greater than or equal to 84" above top of active fuel (9)	A
2	High Drywell Pressure	Less than or equal to 2 psig (4),(5)	A
2 (2)	High Flow Main Steam Line	Less than or equal to 120% of rated steam flow	B
2 of 4 in each of 4 sets	High Temperature Main Steamline Tunnel	Less than or equal to 200°F.	B
2	High Radiation Main Steamline Tunnel	Less than or equal to 3 times full power background (7),(6)	B
2	Low Pressure Main Steamline	Greater than or equal to 850 psig	B
	High Flow Isolation		
1	Condenser Line Steamline Side	Less than or equal to 20 psi diff on steamline side.	C
1	Condensate Return Side	Less than or equal to 32" water diff on condensate return side	C
2	High Flow HPCI Steamline	Less than or equal to 150 inches of water diff. (8)	D
4	High Temperature HPCI Steamline Area	Less than or equal to 200°F.	D

Notes:
(See Next Page)

300% rated steam flow

3960a
3843A

TABLE 3.2.2

INSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND CONTAINMENT COOLING SYSTEMS

Min. No. of Operable Inst. Channels per Trip System (1)	Trip Function	Trip Level Setting	Remarks
2	Reactor Low Low Water Level	84" (plus 4, minus 0 inches) above top of active fuel (5) (Greater than or equal to)	1. In conjunction with low reactor pressure initiates core spray and LPCI. 2. In conjunction with high dry-well pressure, 120 sec. time delay, and low pressure core cooling interlock initiates auto blowdown. 3. Initiates HPCI and SBGTS. 4. Initiates starting of diesel generators.
2	High Drywell Pressure (2), (3)	Less than or equal to 2 PSIG	1. Initiates core spray LPCI, HPCI, and SBGTS. 2. In conjunction with low low water level 120 sec. time delay and low pressure core cooling interlock initiates auto blowdown. 3. Initiates starting of diesel generators.
1	Reactor Low Pressure	Greater than or equal to 300 PSIG & less than or equal to 350 PSIG	1. Permissive for opening core spray and LPCI admission valves. 2. In conjunction with low low reactor water level initiates core spray and LPCI.
1(4)	Containment Spray Interlock 2/3 Core Height	Greater than or equal to 2/3 core height	Prevents inadvertent operation of containment spray during accident conditions.
2(4)	Containment High Pressure	Greater than or equal to 0.5 PSIG & less than or equal to 1.5 PSIG	Prevents inadvertent operation of containment spray during accident conditions.
1	Timer Auto Blowdown	Less than or equal to 120 seconds	In conjunction with low low reactor water level, high dry-well pressure and low pressure core cooling interlock initiates auto blowdown.
2	Low Pressure Core Cooling Pump Discharge Pressure	Greater than or equal to 50 PSIG & less than or equal 100 PSIG	* Defers APR actuation pending confirmation of low pressure core cooling system operation.
2/Bus	4 KV Loss of Voltage Emergency Buses	Trip on 2930 volts plus or minus 5% decreasing voltage	1. Initiates starting of diesel generators. 2. Permissive for starting ECCS pumps. 3. Removes nonessential loads from buses. 4. Trips emergency bus normal feed breakers.
2	Sustained High Reactor Pressure	Less than or equal to 1070 PSIG for 15 seconds	Initiates isolation condenser.
2/Bus	Degraded Voltage on 4 KV Emergency Buses	Greater than or equal to 3708 volts (equals 3784 volts less 2% tolerance) after less than or equal to 5 minutes (plus 5% tolerance) with a 7 second (plus or minus 20%) inherent time delay	Initiates alarm and picks up time delay relay. Diesel generator picks up load if degraded voltage not corrected after time delay.

Notes: (See next page)

3.2 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

top of active fuel. Retrofit 8 X 8 fuel has an active fuel length 1.24 inches longer than earlier fuel designs. However, present trip setpoints were used in the LOCA analyses. This trip initiates closure of Group 2 and 3 primary containment isolation valves but does not trip the recirculation pumps (reference SAR Section 7.7.2). For a trip setting of 504 inches above vessel zero (144 inches above top of active fuel) and a 60-second valve closure time, the valves will be closed before perforation of the cladding occurs even for the maximum break; the setting is therefore adequate.

The low low reactor level instrumentation is set to trip when reactor water level is 444 inches above vessel zero (with top of active fuel defined as 360 inches above vessel zero, - 59 inches is 84 inches above the top of active fuel). This trip initiates closure of Group I primary containment isolation valves (reference SAR Section 7.7.2.2) and also activates the ECC subsystems, starts the emergency diesel generator, and trips the recirculation pumps. This trip setting level was chosen to be high enough to prevent spurious operation but low enough to initiate ECCS operation and primary system isolation so that no melting of the fuel cladding will occur and so that post accident cooling can be accomplished and the guidelines of 10 CFR 100 will not be exceeded. For the complete circumferential break of a 28-inch recirculation line and with the trip setting given above, ECCS initiation and primary isolation are initiated and in time to meet the above criteria. The instrumentation also covers the full spectrum of breaks and meets the above criteria.

high

low

The high-drywell pressure instrumentation is a backup to the water level instrumentation and, in addition to initiating ECCS, it causes isolation of Group 2 isolation valves. For the breaks discussed above, this instrumentation will initiate ECCS operation at about the same time as the low low water level instrumentation; thus the results given above are applicable here, also Group 2 isolation valves include the drywell vent, purge and sump isolation valves. High-drywell pressure activates only these valves because high drywell pressure could occur as the result of non-safety-related causes such as not purging the drywell air during startup. Total system isolation is not desirable for these conditions, and only the valves in Group 2 are required to close. The low low water level instrumentation initiates protection for the full spectrum of loss-of-coolant accidents and causes a trip of Group 1 primary system isolation valves.

3.2 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

and/or bypass valves to open. With the trip set at 850 psig, inventory loss is limited so that fuel is not uncovered and peak clad temperatures are much less than 1500 degrees F; thus, there are no fission products available for release other than those in the reactor water. (Ref. Section 11.2.3 SAR)

Two sensors on the isolation condenser supply and return lines are provided to detect the failure of isolation condenser line and actuate isolation action. The sensors on the supply and return sides are arranged in a 1 out of 2 logic and, to meet the single failure criteria, all sensors and instrumentation are required to be operable. The trip settings of 20 psig and 32 inches of water and valve closure time are such as to prevent uncovering the core or exceeding site limits. The sensors will actuate due to high flow in either direction.

differential

≤ 300% rated steam flow

The HPCI high flow and temperature instrumentation are provided to detect a break in the HPCI piping. Tripping of this instrumentation results in actuation of HPCI isolation valves, i.e., Group 4 valves. Tripping logic for this function is the same as that for the isolation condenser and thus all sensors are required to be operable to meet the single failure of design flow and valve closure time are such that core uncovery is prevented and fission product release is within limits.

The instrumentation which initiates ECCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed.

The control rod block functions are provided to prevent excessive control rod withdrawal so that MCPR does not go below the MCPR fuel cladding integrity safety limit. The trip logic for this function is 1 out of n, e.g., any trip on one of the six APRM's, 8 IRM's, or 4 SRM's will result in a rod block. The minimum instrument channel requirements assure sufficient instrumentation to assure the single failure criteria are met. The minimum instrument channel requirements for the RBM may be reduced by one for a short period of time to allow for maintenance, testing or calibration. This time period is only approximately 3% of the operating time in a month and does not significantly increase the risk of preventing an inadvertent control rod withdrawal. During Single Loop Operation, the flow biased RBM is reduced by 4 percent to compensate for reverse flow in the idle loop jet pumps.

The APRM rod block function is flow biased and prevents a significant reduction in MCPR, especially during operation at

3960a
3843a

1.1 SAFETY LIMIT (Cont'd.)

C. Power Transient

1. The neutron flux shall not exceed the scram setting established in Specification 2.1.A for longer than 1.5 seconds as indicated by the process computer.

2. When the process computer is out of service, this safety limit shall be assumed to be exceeded if the neutron flux exceeds the scram setting established by Specification 2.1.A and a control rod scram does not occur.

D. Reactor Water Level (Shutdown Condition)

Whenever the reactor is in the shutdown condition with irradiated fuel in the reactor vessel, the water level shall not be less than that corresponding to 12 inches above the top of the active fuel when it is seated in the core.

Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

2.1 LIMITING SAFETY SYSTEM SETTING (Cont'd.)

The adjustment may also be performed by increasing the APRM gain by FDLRC which accomplishes the same degree of protection as reducing the trip setting by 1/FDLRC.

C. Reactor low water level scram setting shall be greater than or equal to 144" above the top of the active fuel at normal operating conditions.

Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

greater than or equal to

D. Reactor low water level ECCS initiation shall be 84" (plus 4", minus 0") above the top of the active fuel at normal operating conditions.

Note: Top of active fuel is defined to be 360 inches above vessel zero (see Bases 3.2).

inches

TABLE 3.2.1

INSTRUMENTATION THAT INITIATES PRIMARY CONTAINMENT ISOLATION FUNCTIONS

MINIMUM # OF OPERABLE INST. CHANNELS PER TRIP SYSTEM (1)	INSTRUMENTS	TRIP LEVEL SETTING	ACTION (3)
2	Reactor Low Water Level	Greater than 144" above top of active fuel (8)	A
2	Reactor Low Low Water	Greater than or equal to 84" above top of active fuel (8)	A
2	High Drywell Pressure	Less than or equal to 2 psig (4),(5)	A
2 (2)	High Flow Main Steam Line	Less than or equal to 120% of rated steam flow	B
2 of 4 in each of 4 sets	High Temperature Main Steamline Tunnel	Less than or equal to 200°F.	B
2	High Radiation Main Steamline Tunnel	Less than or equal to 3 times full power background (6)	B
2	Low Pressure Main Steamline	Greater than or equal to 850 psig	B
1	High Flow Isolation Condenser Line Steamline Side	Less than or equal to 20 psi diff on steamline side.	C
1	Condensate Return Side	Less than or equal to 14.8" water diff on condensate return side	C
2	High Flow HPCI Steamline	Less than or equal to 150 inches of water diff. (7)	D
4	High Temperature HPCI Steamline Area	Less than or equal to 200°F.	D

Notes:
(See Next Page)

300% rated steam flow

3840a
3845A

TABLE 3.2.2

INSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND CONTAINMENT COOLING SYSTEMS

Min. No. of Operable Inst. Channels per Trip System (1)	Trip Function	Trip Level Setting	Remarks
(2)	Reactor Low Low Water Level	84" (plus 4, minus 0 inches) above top of active fuel (5)	1. In conjunction with low reactor pressure initiates core spray and LPCI. 2. In conjunction with high dry-well pressure, 120 sec. time delay, and low pressure core cooling interlock initiates auto blowdown. 3. Initiates HPCI and SBGTS. 4. Initiates starting of diesel generators.
2	High Drywell Pressure (2), (3)	Less than or equal to 2 PSIG	1. Initiates core spray LPCI, HPCI, and SBGTS. 2. In conjunction with low low water level 120 sec. time delay and low pressure core cooling interlock initiates auto blowdown. 3. Initiates starting of diesel generators.
1	Reactor Low Pressure	Greater than or equal to 300 PSIG & less than or equal to 350 PSIG	1. Permissive for opening core spray and LPCI admission valves. 2. In conjunction with low low reactor water level initiates core spray and LPCI.
1(4)	Containment Spray Interlock 2/3 Core Height	Greater than or equal to 2/3 core height	Prevents inadvertent operation of containment spray during accident conditions.
2(4)	Containment High Pressure	Greater than or equal to 0.5 PSIG & less than or equal to 1.5 PSIG	Prevents inadvertent operation of containment spray during accident conditions.
1	Timer Auto Blowdown	Less than or equal to 120 seconds	In conjunction with low low reactor water level, high dry-well pressure and low pressure core cooling interlock initiates auto blowdown.
2	Low Pressure Core Cooling Pump Discharge Pressure	Greater than or equal to 50 PSIG & less than or equal 100 PSIG	* Defers APR actuation pending confirmation of low pressure core cooling system operation.
2/Bus	4 KV Loss of Voltage, Emergency Buses	Trip on 2930 volts plus or minus 5% decreasing voltage	1. Initiates starting of diesel generators. 2. Permissive for starting ECCS pumps. 3. Removes nonessential loads from buses. 4. Trips emergency bus normal feed breakers.
2	Sustained High Reactor Pressure	Less than or equal to 1070 PSIG for 15 seconds	Initiates isolation condenser.
2/Bus	Degraded Voltage on 4 KV Emergency Buses	Greater than or equal to 3708 volts (equals 3784 volts less 2% tolerance) after less than or equal to 5 minutes (plus 5% tolerance) with a 7 second (plus or minus 20%) inherent time delay	Initiates alarm and picks up time delay relay. Diesel generator picks up load if degraded voltage not corrected after time delay.

Greater than or equal to

Notes: (See next page)

3.2 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

top of active fuel. Retrofit 8 X 8 fuel has an active fuel length 1.24 inches longer than earlier fuel designs. However, present trip setpoints were used in the LOCA analyses. This trip initiates closure of Group 2 and 3 primary containment isolation valves but does not trip the recirculation pumps (reference SAR Section 7.7.2). For a trip setting of 504 inches above vessel zero (144 inches above top of active fuel) and a 60-second valve closure time, the valves will be closed before perforation of the cladding occurs even for the maximum break; the setting is therefore adequate.

The low low reactor level instrumentation is set to trip when reactor water level is 444 inches above vessel zero (with top of active fuel defined as 360 inches above vessel zero, - 59 inches is 84 inches above the top of active fuel). This trip initiates closure of Group I primary containment isolation valves (reference SAR Section 7.7.2.2) and also activates the ECC subsystems, starts the emergency diesel generator, and trips the recirculation pumps. This trip setting level was chosen to be high enough to prevent spurious operation but low enough to initiate ECCS operation and primary system isolation so that no melting of the fuel cladding will occur and so that post accident cooling can be accomplished and the guidelines of 10 CFR 100 will not be exceeded. For the complete circumferential break of a 28-inch recirculation line and with the trip setting given above, ECCS initiation and primary isolation are initiated and in time to meet the above criteria. The instrumentation also covers the full spectrum of breaks and meets the above criteria.

high

low

The high-drywell pressure instrumentation is a backup to the water level instrumentation and, in addition to initiating ECCS, it causes isolation of Group 2 isolation valves. For the breaks discussed above, this instrumentation will initiate ECCS operation at about the same time as the low low water level instrumentation; thus the results given above are applicable here, also Group 2 isolation valves include the drywell vent, purge and sump isolation valves. High-drywell pressure activates only these valves because high drywell pressure could occur as the result of non-safety-related causes such as not purging the drywell air during startup. Total system isolation is not desirable for these conditions, and only the valves in Group 2 are required to close. The low low water level instrumentation initiates protection for the full spectrum of loss-of-coolant accidents and causes a trip of Group 1 primary system isolation valves.

3840a
3845A

3.2 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

and/or bypass valves to open. With the trip set at 850 psig, inventory loss is limited so that fuel is not uncovered and peak clad temperatures are much less than 1500 degrees F; thus, there are no fission products available for release other than those in the reactor water. (Ref. Section 11.2.3 SAR)

Two sensors on the isolation condenser supply line and two sensors on the return line are provided to detect the failure of isolation condenser line and actuate isolation action. The sensors on the supply and return sides are arranged such that any one of the four sensors can cause isolation and, to meet the single failure criteria, all sensors and instrumentation are required to be operable. The trip settings of 20 psi differential and 14.8 inches of water differential and valve closure time are such as to prevent uncovering the core or exceeding site limits. The sensors will actuate due to high flow in either direction. ≤ 300% rated steam flow

The HPCI high flow and temperature instrumentation are provided to detect a break in the HPCI piping. Tripping of this instrumentation results in actuation of HPCI isolation valves, i.e., Group 4 valves. Tripping logic for this function is the same as that for the isolation condenser and thus all sensors are required to be operable to meet the single failure of design flow and valve closure time are such that core uncovery is prevented and fission product release is within limits.

The instrumentation which initiates ECCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed.

The control rod block functions are provided to prevent excessive control rod withdrawal so that MCPR does not go below the MCPR fuel cladding integrity safety limit. The trip logic for this function is 1 out of n, e.g., any trip on one of the six APRM's, 8 IRM's, or 4 SRM's will result in a rod block. The minimum instrument channel requirements assure sufficient instrumentation to assure the single failure criteria are met. The minimum instrument channel requirements for the RBM may be reduced by one for a short period of time to allow for maintenance, testing or calibration. This time period is only approximately 3% of the operating time in a month and does not significantly increase the risk of preventing an inadvertent control rod withdrawal. During Single Loop Operation, the flow biased RBM is reduced by 4 percent to compensate for reverse flow in the idle loop jet pumps.

The APRM rod block function is flow biased and prevents a significant reduction in MCPR, especially during operation at

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Dresden Nuclear Power Station Units 2 and 3 in accordance with the proposed amendment will not:

Involve a significant increase in the probability or consequences of an accident previously evaluated because:

HPCI Steamline High Flow Isolation Trip Level Setting

The purpose of the HPCI leak detection systems are to detect breaks in the system piping. Normal steam flows within the system can fluctuate in excess of 250% rated flow and exceed 500% rated steam flow after experiencing a break. During the original licensing of the plant, it was analytically determined by GE that three times maximum steam flow (300%) is the optimum setpoint for the isolation of HPCI. A 300% steam flow setpoint ensures that spurious trips are avoided and that breaks in the piping are identified. Because the HPCI High Steamline Flow Isolation setpoint is not assumed as an accident precursor, the probability of any previously evaluated accident is not increased by the changed setpoint.

The proposed changes to the setpoint allow a more accurate and conservative value for 300% steam flow. The proposed change in conjunction with a more conservative field setting ensures HPCI isolation occurring between the range of 300% and 500% steam flow, thus ensuring HPCI isolation in the event of a pipe break. Because the HPCI high steamline flow setpoint will be maintained above normally found operational values (272% steam flow) and below expected conditions with a pipe break (500% steam flow), the consequences of any previously evaluated accident are not increased with the proposed setpoint change.

Isolation Condenser Steamline High Flow Isolation Trip Level Setting

The purpose of the Isolation Condenser leak detection instrumentation is to detect breaks in the system piping. Normal steam flows within the system can fluctuate in excess of 250% rated flow and exceed 500% rated steam flow after experiencing a break. During the original licensing of the plant, it was analytically determined by GE that three times rated steam flow (300%) is the optimum setpoint for the isolation of the Isolation Condenser. A 300% steam flow Isolation setpoint ensures that spurious trips are avoided and that breaks in the piping are identified. Because the Isolation Condenser High Steamline Flow setpoint is not assumed as an accident precursor, the probability of any previously evaluated accident is not increased by the changed setpoint. The proposed changes to the setpoint provide a more accurate and conservative field setting for 300% steam flow.

The proposed changes in conjunction with a more conservative field setting results in Isolation Condenser isolation occurring between the range of 300% and 500%

steam flow, thus ensuring Isolation Condenser isolation in the event of a pipe break. Because the Isolation Condenser High Steamline Flow Isolation setpoint will be maintained above normally found operational values (272% steam flow) and below expected conditions with a pipe break (500% steam flow), the consequences of any previously evaluated accident are not increased with the proposed setpoint change.

Reactor Low-Low Water Level Trip Level Setting Tolerance

The Low-Low Reactor Water Level trip setting is designed to initiate ECCS when reactor water level is less than or equal to 444 inches above vessel zero. Top of active fuel (TAF) is defined as 360 inches above vessel zero. -59 inches is 84 inches above TAF. The present trip setting tolerance (84 inches, + 4, - 0, above TAF) only allows a deviation of 4 inches in the conservative direction. The proposed change (greater than or equal to 84 inches) does not impose a restriction on the limit toward the conservative direction. Because a level switch trip level setting by itself is not assumed as an accident precursor, the probability of any previously evaluated accident is not increased by the changed setpoint.

The proposed change eliminates a restriction on the trip level setting for Low-Low Reactor Water Level. Dresden proposes modifying the acceptance limit of the Low-Low trip setting such that the instrument field setting will not deviate below 84 inches. Therefore, the actuation of appropriate ECCS are unchanged and the consequences of any previously evaluated accident are not increased with the proposed setpoint change.

Create the possibility of a new or different kind of accident from any accident previously evaluated because:

HPCI Steamline High Flow Isolation Trip Level Setting

The purpose of the HPCI Steamline High Flow Isolation trip level setting is to detect breaks in system piping and initiate isolation of the system if breaks are discovered. Normal steam flows within the system can fluctuate as high as 250% rated flow and exceed 500% rated steam flow after experiencing a break. 300% steam flow has been used as the setpoint to ensure that spurious trips are avoided and that breaks in the piping are identified. The changes to the HPCI High Steamline Flow setpoint ensure that isolation occurs at 300% rated steam flow (below 500% rated steam flow). The current setpoint will also isolate below 500% rated steam flow. Because the new setpoint continues to allow normal operational flexibility and ensures isolation in the event of a pipe break, the proposed changes do not create the possibility of a new or different kind of accident than previously evaluated.

Isolation Condenser Steamline High Flow Isolation Trip Level Setting

The purpose of the Isolation Condenser Steamline High Flow Isolation trip level setting is to detect breaks in system piping and initiate isolation of the system if breaks are discovered. Normal steam flows within the system can fluctuate in excess of 250% rated flow and exceed 500% rated steam flow after experiencing a break. 300% steam flow has been used as the setpoint to ensure that spurious trips are avoided and ensures that isolation occurs at 300% rated steam flow (below 500% rated steam flow). The current setpoint will also isolate below 500% rated steam flow. Because the new setpoint continues to allow normal operational flexibility and ensures isolation in the event of a pipe break, the proposed changes

do not create the possibility of a new or different kind of accident than previously evaluated.

Reactor Low-Low Level Trip Level Setting Tolerance

The Reactor Low-Low Water Level trip setting is designed to initiate the appropriate ECCS when Reactor Water Level is decreasing. The proposed change to the setpoint only eliminates the overly burdensome restriction within the setpoint tolerances. The absolute low limit of 84 inches is unchanged, thus maintaining all assumptions related to 84 inches (-59 inches indicated level) within Dresden's Safety Analysis. The removal of the upper tolerance will not increase the probability of inadvertent ECCS initiation since the actual field setting will be at a reactor vessel level which has not been reached in 40+ years of operation at Dresden Units 2 and 3. Therefore, the proposed changes do not create the possibility of a new or different kind of accident than previously evaluated.

Involve a significant reduction in the margin of safety because:

High Pressure Coolant Injection Setpoint

The HPCI high steamline flow setpoint ensures that isolation occurs at 300% maximum steam flow (below 500% rated steam flow). The current Technical Specification setpoint will also allow isolation below 500% rated steam flow but at a value greater than 300%. Thus, the proposed setpoint isolates at a lower steam flow rate than the current limit. Therefore, because isolation of HPCI would occur at a lower steam flow rate during a pipe break, the proposed changes do not involve a significant reduction in the margin of safety.

Isolation Condenser Steamline High Flow Isolation Trip Level Setting

The Isolation Condenser High Steamline Flow Isolation Trip Level setting ensures that isolation occurs at 300% rated steam flow (below 500% rated steam flow). The current setpoint will also isolate below 500% rated steam flow but at a value greater than 300%. Thus, the proposed setpoint isolates at a lower steam flow rate than the current limit. Therefore, because isolation of the Isolation Condenser would occur at a lower steam flow rate during a pipe break, the proposed changes do not involve a significant reduction in the margin of safety.

Reactor Low-Low Level Trip Level Setting Tolerance

The Reactor Low-Low Water Level trip setting tolerance ensures the proper initiation of appropriate ECCS in the event of a loss of inventory to the vessel. The proposed change to the setpoint only eliminates the restriction within the setpoint tolerances. The absolute low limit of 84 inches is unchanged, thus maintaining all assumptions related to 84 inches (minus 59 inches indicated) within Dresden's Safety Analysis. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed changes against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.